DISTRICT OF MASSACHUSETTS UNITED STATES DISTRICT COURT

			CIVII ACTION
		1	CASE NO. 04-11779 - RCL
George Logue		1	The Market Art of State
		1	
	Plaintiff	1	
		1	
V.		1	
_		1	
Experian, Inc.		1	
	Defendant	1	
		1	
		1	

PROPOSED SCHEDULE

Pursuant to Federal Rules of Civil Procedure, Rules 16(b) and Local Rule 16.1, and in accordance with this Court's Order, plaintiff submits this individual statement for the conference of January 12, 2005. Plaintiff was finally able to make contact with defense counsel on January 3, 2005, alerting them to the fact of the deadlines imposed by the Court. However, where a timely joint submission was impossible, plaintiff proposes the following pretrial schedule.

- 1. By <u>January 26, 2005</u>, the parties shall make the automatic document disclosures required by Local Rule 26.2.
- 2. Any motion to join other parties, amend pleadings or motion to file additional pleadings shall be filed by <u>February 15, 2005</u>, and responses shall be filed as required by the applicable provisions of Rules of Civil Procedure.
- 3. Plaintiff respectfully suggests that all discovery could be completed by August 30, 2005.
- 4. Any dispositive motions shall be filed by October 31, 2005.
- 5. Plaintiff respectfully suggests any responses to dispositive motions could be filed 14 days after the date for those motions.

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- 6. Plaintiff respectfully suggests parties meet at least once thereafter to explore the possibility of settlement and report to the Court by December 31, 2005 the status and prospects for settlement.
- 7. Plaintiff suggest a final pretrial conference of <u>January 19, 2006</u>.

Plaintiff requests, and subject to the Court's approval, that all pleadings may be submitted and served on plaintiff in paper form and not electronically.

DATED: January 5, 2005

CERTIFICATE OF SERVICE

I, George Logue, plaintiff, hereby certify that on the 5th day of January, 2005, I caused a true copy of the documents above to be served on the defense as listed below, by serving one copy of same, by first class mail postage paid.

Mr. Robert White Bourgeois, Dresser, & White Four Dix Street Worcester, MA 01609